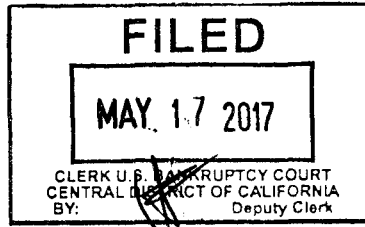


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6 Plaintiff: PRO SE



7 **UNITED STATES BANKRUPTCY COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9 **LOS ANGELES DIVISION**

10 In re

11 BEVERLY MONIQUE MURRAY-
12 CALCOTE,
13

14 Debtor.
15
16
17

Case No.: 2:17-bk-11972-RK

Chapter 7

**MOTION TO EXTEND THE DEADLINE
TO FILE AN OBJECTION TO THE
DEBTOR'S DISCHARGE PURSUANT TO
11 U.S.C. § 523 AND/OR 11 U.S.C. § 727**

[No Hearing Required]

18
19 **TO THE HONORABLE ROBERT N. KWAN, UNITED STATES BANKRUPTCY JUDGE;**
20 **THE DEBTOR AND ALL PARTIES IN INTEREST:**

21 Larnita Pette, a party in interest (the "Movant") and plaintiff in pending lawsuits filed
22 against Beverly Monique Murray-Calcote (the "Debtor") in the San Diego County Superior
23 Court (the "San Diego Court") and the Orange County Superior Court (the "Orange County
24 Court"), Probate Division moves the court for an order pursuant to Rule 4004(b) to extend
25 the deadline to file a complaint to the Debtor's discharge under 11 U.S.C. § 523 and/or 11
26 U.S.C. § 727.

27 ///

28 ///

1 In support of the Motion to Extend the Deadline, the Creditor refers to the following recitals:

2 **RECITALS**

- 3 A. The Debtor filed a petition for relief for under chapter 7 of the Bankruptcy Code on
4 February 17, 2017.
- 5 B. The Movant's first notice of the Debtor's Chapter 7 Bankruptcy filing occurred on
6 April 6, 2015 when the Debtor filed a Notice of Stay with the San Diego Court in
7 response to an ex parte hearing scheduled for April 6, 2017.
- 8 C. The Debtor never served a Notice of Stay of Proceedings on the Movant. The San
9 Diego Court and Orange County Court were served notice after the Debtor's initial
10 341 hearing on March 24, 2017.
- 11 D. The San Diego Court was served the Notice of Stay on April 6, 2017.
- 12 E. The Orange County Court was served the Notice of Stay on April 12, 2017.
- 13 F. The Debtor failed to disclose, in her Chapter 7 Schedule B filing, a beneficial interest
14 in the Bobbye J. Rives Trust ("Trust") and that she received at least \$100,000 in
15 inheritance and compensation from the Trust. The Debtor also failed to disclose her
16 interest in an unscheduled business, Hair Connection Plus.
- 17 G. The initial 341 hearing occurred on March 24, 2017. The Debtor failed to disclose a
18 beneficial interest in the Trust. The hearing was continued to May 1, 2017 for other
19 deficiencies.
- 20 H. The Debtor failed to appear at the 341 hearing on May 1, 2017.
- 21 I. The Debtor's 341 hearing was continued to June 5, 2017.
- 22 J. The deadline to file an objection to the Debtor's discharge is May 23, 2017.
- 23 K. Due to the Debtor's non appearance at the 341 hearing, the Movant requests
24 additional time to determine if or how the Debtor will respond to the requests of the
25 Chapter 7 trustee.
- 26 L. On May 15, 2017, counsel for the Chapter 7 trustee filed a Motion for Extension of
27 Time for Filing Complaint Objecting to Debtor's Discharge.
- 28

PRAYER

Based on the foregoing, the Movant also respectfully requests that the court:

1. Grant an extension to file objections to the Debtor's discharge due to the Debtor's late filing of the Notice of Stay with the Courts effectively reduced the Movant's time to file objections to less than 60 days.

2. Grant an extension of the deadline for filing an adversary complaint objecting to the Debtor's Chapter 7 discharge under 11 U.S.C. § 523 and/or 11 U.S.C. § 727 to and through September 29, 2017.

3. Grant the Movant such and further relief as is just and proper under the circumstances.

Dated: May 17, 2017

By: 

Larnita Pette, Movant (Pro Se)